

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ARLENE J. DELGADO,
Plaintiff,

-vs-

No. 19-cv-11764 (AT) (KHP)

DONALD J. TRUMP FOR PRESIDENT, INC.,
TRUMP FOR AMERICA, INC., SEAN SPICER,
individually, REINCE PRIEBUS, individually,
and STEPHEN BANNON, individually,

Defendants.

MOTION FOR BRIEF EXTENSION OF TIME

Plaintiff, ARLENE J. DELGADO, hereby files this Motion for Brief Extension of Time, pursuant to FRCP Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, regarding the June 7th deadline to file any Rule 37 Motion pertaining to Defendant-Campaign's latest production, as follows:

The Campaign provided Plaintiff a production of documents on the court-ordered due date, the Friday, May 31, 2024, in the evening.

On Saturday, the Plaintiff notified Defendants-counsel that she was having trouble opening the large zip file sent, password protected, on Dropbox. Defendants' counsel responded but the Plaintiff advised the following day that the file was still having compression issues. The Plaintiff attempted again on Monday and was unsuccessful. Plaintiff was finally able to get the file to download by logging out, redownloading Dropbox, and then attempting to open.

The Plaintiff is unable to review the production, and determine the need for a Rule 37 Motion, in the next 48 hours (the May 14, 2024 Order ordered any such motion be filed by June 7th). Even if the Plaintiff had been able to open the file on Monday morning, as intended (which, even then, would have given her only four days to review and draft any such motion), Plaintiff has had other court-ordered matters in this case to review, draft, and file, including, e.g., the Motion to Compel answers from Brad Parscale (filed June 4th and provided to his counsel), as well as beginning to review an updated, revised privilege log provided by Eric Trump's counsel. In addition to such, the Mother had a months-ago set hearing, on June 4, 2024, in the family law case in Miami-Dade county, in which her child's father seeks to enter a final judgment without adjudication of the arrears amount he owes and without any life insurance for the child, as well as another very serious motion, all of which required not only intense preparation but the Plaintiff (Respondent in that matter) filing two robust Responses on the morning of June 4th and attending the afternoon hearing.

As such, the Plaintiff respectfully requests a deadline extension until Wednesday, June 12th (versus Friday, June 7th) to file any Rule 37 Motion. The Plaintiff files this extension, in accordance with the Court's rules, two working days prior to the deadline.

Respectfully submitted,

s/Arlene Delgado
Arlene Delgado
Plaintiff, *pro-se*